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Subject: Draft EnvirPerfRpt

Regarding the June 2003 draft Environmental Performance Report, Chapter 3, pages 30, 31 and 50.

The draft report implies that fired power generating unit emissions are a minor contributor to overall NOx emissions. This may be based on misleading emissions information. I believe the emissions information presented in Table III-1 is likely based on "average day" emissions - i.e. annual power plant emissions divided by ~365 days per year. If one looks at peak generating day emissions, when most resources are operating at high loads and additional, less efficient resources such as CT peaking turbines are on line, the contribution of electrical generation to overall NOx emissions can be significantly higher (by 2-3 times). Since these peak generating days can also occur during the peak ozone season, such a comparison can provide a better insight into the relative contribution of EG emissions and the significance of recent and future emission reductions.

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